IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

DEBTOR	*	
EDGAR MERCADO SIERRA	*	CHAPTER 13
IN RE	*	BKRTCY. NO. 13-03627 ESL

NOTICE OF FILING OF AMENDED CHAPTER 13 PLAN AND CERTIFICATE OF SERVICE

TO THE HONORABLE COURT:

COMES NOW, **EDGAR MERCADO SIERRA**, debtor in the above captioned case, through the undersigned attorney and very respectfully states and prays as follows:

- 1. The debtor is hereby submitting an amended Chapter 13 Plan, dated May 23, 2013, herewith and attached to this motion.
- 2. These amendments are filed to <u>increase the plans base</u>, <u>hence provide payment</u> to secured <u>creditors and insurance</u>.

NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(g)

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via

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regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 10th day of June, 2013.

/s/ Roberto Figueroa Carrasquillo
ROBERTO FIGUEROA CARRASQUILLO
USDC #203614
ATTORNEY FOR PETITIONER
PO BOX 186 CAGUAS PR 00726
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United States Bankruptcy Court
District of Puerto Rico

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IN RE:	Case No. 3:13-bk-3627
MERCADO SIERRA, EDGAR	Chapter 13
Debtor(s)	

AMENDED CHAPTER 13 PAYMENT PLAN

The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☑ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
 The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

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PLAN DATED:	MAMENDED FLAN DATED. 6/10/2010
□ PRE □ POST-CONFIRMATION	Filed by: ☑ Debtor ☐ Trustee ☐ Other
I. PAYMENT PLAN SCHEDULE	II. DISBURSEMENT SCHEDULE
\$ 250.00 x 12 = \$ 3,000.00 \$ 275.00 x 48 = \$ 13,200.00 \$ x = \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$	A. ADEQUATE PROTECTION PAYMENTS OR \$ B. SECURED CLAIMS: Debtor represents no secured claims. Creditors having secured claims will retain their liens and shall be paid as follows: 1. □ Trustee pays secured ARREARS: Cr Cr Cr # \$ \$ \$ \$ \$ \$ \$ \$ \$ \$_
Other:	4. Debtor SURRENDERS COLLATERAL to Lien Holder:
Periodic Payments to be made other than, and in addition to the above: \$ x = \$	 5. □ Other: 6. □ Debtor otherwise maintains regular payments directly to: C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.
PROPOSED BASE: \$ 16,200.00	11 U.S.C. § 507 and § 1322(a)(2) D. UNSECURED CLAIMS: Plan □ Classifies ☑ Does not Classify Claims.
III. ATTORNEY'S FEES (Treated as § 507 Priorities) Outstanding balance as per Rule 2016(b) Fee Disclosure Statement: \$	1. (a) Class A: ☐ Co-debtor Claims / ☐ Other: ☐ Paid 100% / ☐ Other: Cr Cr Cr # # # \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$
Signed: Aga Newado Devra	OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.) Debtor(s) to provide ADEQUATE PROTECTION PAYMENTS to RELIABLE thru the Trustee in the sum \$100.00 per month for the next eight months or until confirmation.Debtor(s) to provide auto insurance upon maturity to RELIABLE thru Eastern America Insurance Company. Late filed claims filed by creditors will receive no distribution. Debtor reserves the right to object claims after plan confirmation.
Joint Debtor	
Attorney for Debtor R. Figueroa Carrasquillo Law	Office Phone: (787) 744-7699